

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ALOFT MEDIA, LLC,	§
	§
Plaintiff,	§
	§ Civil Action No. 6:09-cv-304
v.	§
	§
ORACLE CORPORATION, et al.	§ JURY TRIAL DEMANDED
	§
Defendants.	§
	§
	§

**PLAINTIFF ALOFT MEDIA, LLC'S ANSWER TO
DEFENDANT HALLIBURTON CO.'S COUNTERCLAIMS**

Plaintiff Aloft Media, LLC (“Aloft”) responds to each of the numbered paragraphs of the Counterclaims of Halliburton Company (“Halliburton”), as set forth in its Original Answer to Plaintiff’s Second Amended Complaint for Patent Infringement as follows:

COUNTERCLAIMS

JURISDICTION

1. Admitted.
2. Admitted.
3. Admitted.

PARTIES

4. Admitted.
5. Admitted.

BACKGROUND

6. Admitted.

7. Aloft admits that Halliburton has denied Aloft's claims of infringement and that Halliburton contends that the patents-in-suit are invalid and unenforceable, but Aloft denies any other allegations.

8. Aloft admits that an actual controversy exists between Halliburton and Aloft, but Aloft denies any other allegations.

COUNT I – DECLARATION OF NON-INFRINGEMENT

9. Aloft restates and incorporates by reference each answer to Counterclaim paragraph 1–8.

10. Admitted.

11. Denied.

12. Aloft admits that Halliburton seeks a declaration of non-infringement of the patents-in-suit, but Aloft denies any other allegations.

COUNT II – DECLARATION OF PATENT INVALIDITY

13. Aloft restates and incorporates by reference each answer to Counterclaim paragraph 1–12.

14. Denied

15. Aloft admits that Halliburton seeks a declaration that the patents-in-suit are invalid and/or unenforceable, but Aloft denies any other allegations.

PRAYER FOR RELIEF

Aloft denies that Halliburton is entitled to any relief, and specifically denies that Halliburton is entitled to any of the relief requested in paragraphs A-F of Halliburton's Prayer for Relief.

DEMAND FOR JURY TRIAL

Aloft demands a trial by jury on all issues so triable.

Dated: March 1, 2010

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by facsimile transmission and/or first class mail this 1st day of March, 2010.

Connie Kuykendall